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IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1957

No. 774.

STATE OF GEORGIA,
WESTERN & ATLANTIC RAILROAD, and
LOUISVILLE AND NASHVILLE RAILROAD COMPANY, - - - - - Appellants,

versus

UNITED STATES OF AMERICA,
INTERSTATE COMMERCE COMMISSION,
ET AL., - - - - - - - - - - Appellees.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA.

BRIEF IN OPPOSITION TO MOTIONS TO AFFIRM.

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COMPANY, - - - - - - - - - *Appellants,*

v.

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ET AL., - - - - - - - - - - *Appellees.*

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA.

BRIEF IN OPPOSITION TO MOTIONS TO AFFIRM.

STATEMENT.

As provided for by the Court's Revised Rule 16, appellants file this brief in opposition to the motions to affirm filed by the United States of America and the Interstate Commerce Commission, herein referred to jointly as the "Government," and by Southern Rail-

way Company and certain of its affiliates, herein referred to jointly as "Southern." The motions fail to show the asserted lack of substantiality of the questions presented by the Jurisdictional Statement and accordingly should be denied.

The Government's contentions are, generally speaking, the same as those advanced by Southern, with two exceptions to be noted. In substance, the contentions common to both the Government and Southern appear to be:

That the rule relating to invasion of territory of one railroad by another through new track construction, promulgated in *Texas & Pac. Ry. v. Gulf, etc., Ry.*, 270 U. S. 266 (1926), is applicable here because it has been held to control in other cases "under the circumstances present here" (Government's motion, p. 6);

That the evidence is "more than sufficient to support the Commission's conclusion" (Government's motion, p. 7) as to adequacy of existing service at Boyce and as to the public interest;

That the district court "gave extended consideration to both the factual and legal aspects" (Government's motion, p. 8) of the question of the Commission's jurisdiction, and that acceptance by the court of the Commission's findings on this issue was not an abdication of its judicial duty "to determine the legal significance of these facts" (Government's motion, p. 8).

In addition, Southern, but not the Government, makes the assertion, demonstrably erroneous, that the issues are moot (Southern's motion, p. 15) and that,

should appellants' position be upheld, the Commission's authority would be "drastically" restricted and other rail carriers would suffer "disastrous" effects (Southern's motion, pp. 4, 16).

The arguments of both the Government and Southern rely upon considerations and facts which for the most part do not relate to the issue of jurisdiction—the central issue before the Court.

In the section which follows, appellants will respond to each of appellees' arguments which seem to require comment additional to the presentation in the Jurisdictional Statement.

ARGUMENT.

1. The Texas & Pacific Case Does Not Control Here.

(A) THE TEXAS & PACIFIC RULE IS LIMITED IN APPLICATION BY ITS OWN TERMS.

Appellants are in accord with the suggestion (Southern's motion, p. 13) that the so-called "doctrine" of *Texas & Pacific* should be viewed in the light of the entire decision and consonant with its purpose. But in so viewing that doctrine, it should be remembered that that case did not, as does this one, involve an attempt by a subservient carrier to eject its grantor from territory bordering the grantor's right of way.

The opinion in that case does not purport to "set forth *the** principles governing the determination as to whether a proposed track is an 'extension'" (South-

*Emphasis supplied by appellants here and elsewhere unless otherwise noted.

ern's motion, p. 11), excluding all other considerations; nor has it been followed in "hundreds of cases" (Southern's motion, p. 11). It merely provides a rule of construction which removes from the exception provisions of Section 1, paragraph (22) of the Interstate Commerce Act, trackage, normally within the terms of that paragraph, which would constitute an invasion of traffic territory and which would create a competitive situation that might prove harmful to both the carriers and the public. The discussion appearing in the dicta at pages 277-278 of 270 U. S. deals in a general way with considerations applicable to all railroad track construction subject to Commission authority, including those cases where the Commission's jurisdiction is unquestioned.

In the finality, the *Texas & Pacific* case provides for an exception to the exceptions included in paragraph (22).* And if, as this Court has held—*Piedmont & Northern Ry.* v. *Comm'n.*, 286 U. S. 299, 311, 312,—the exceptions or exemptions made by that paragraph must be narrowly construed, then *a fortiori* the rule of *Texas & Pacific* itself should be all the more narrowly construed. The case has been distinguished as often as it has been followed, most notably in *Missouri, K. & T. R. Co.* v. *Texas & N. O. R. Co.*, 172 F. 2d 768 (C. A. 5, 1949), and *Pennsylvania Railroad Co.* v. *Reading Co.*, 132 F. Supp. 616 (D. C., E. D. Pa., 1955), affirmed 226 F. 2d 958 (C. A. 3, 1955).

*The statutes involved, paragraphs (18) and (22) of Section 1 of the Interstate Commerce Act, are reproduced as Appendix E to the Jurisdictional Statement.

Contrary to Southern's assertion (motion, p. 12) that appellants' position is based upon a single sentence from *Texas & Pacific,* the discussion beginning at page 13 of the Jurisdictional Statement includes an analysis of the opinion and appropriately quotes not only the rule but the underlying reasoning. The language there quoted epitomizes "the rationale of the entire opinion" (Southern's motion, p. 13). The rule itself makes clear that the Court restricted its application to those instances where a railroad undertakes to reach "new territory"; that is, "territory not theretofore served by the carrier" (270 U. S. at p. 278). Southern recognizes this to be the correct interpretation by its labored effort to show that appellants are not serving Boyce.

(B) THE BOYCE TEAM TRACK ESTABLISHES THE FACT OF SERVICE BY APPELLANTS, BUT IS ONLY ONE OF SEVERAL FACTORS IN THIS CASE SHOWING THAT NO INVASION WOULD RESULT FROM THE PROPOSED CONSTRUCTION.

Southern seeks summarily to dispose of the important jurisdictional fact of appellants' service by team track by indulging in wholly unsupported speculation as to the "unlikely" use of that facility (motion, p. 13). It should not be necessary to add counter speculation that it is much more unlikely that a carrier would maintain a facility for more than forty years if it were not being used. Such speculation is beside the point; the team track is and for many years has been available and offered to the public, whether or not the record shows actual use, and establishes the fact of service by appellants.

The force of this fact cannot be overcome by the specious argument that if appellants' team track service, together with other factors here present, is held to be enough to remove the proposed trackage from the reach of the *Texas & Pacific* rule, then any carrier providing such service would, *ipso facto,* be free to construct whatever tracks it may desire, irrespective of length and other considerations (Southern's motion, p. 16). That the argument is unsound is clear, for it requires ignoring the many other factors involved in the law governing track construction reviewed in the Jurisdictional Statement at pages 22-25.

(C) APPELLANTS' SERVICE THROUGH RECIPROCAL SWITCHING REMOVES THE INSTANT CASE FROM THE REASONING AND RULE OF TEXAS & PACIFIC.

Reciprocal switching is germane to this case only insofar as it establishes the jurisdictional fact of service by appellants. On this specific point, Southern cites only one case (*Missouri Pacific R. Co.* v. *Chicago, R. I. & P. R. Co.,* 41 F. 2d 188 (C. A. 8, 1930)), in support of the argument that appellants' service by this means is not "service" within the contemplation of the *Texas & Pacific* case (motion, p. 16). Reciprocal switching was mentioned incidentally in the *Missouri Pacific-Rock Island* case, but so far as appears from the opinion, no issue was made of it.

The correctness of the decision, if it depended at all upon reciprocal switching as a factor, is questionable as it is not in accord with the weight of authority, which holds that service through reciprocal switching

is the service of the line-haul carrier. Please see *Missouri Pac.* v. *Reynolds-Davis,* 268 U. S. 366, 369 (1925); *Crossfield Ice Co.* v. *Southern Ry. Co.,* 232 I. C. C. 795 (1939); *Automobiles to Southern Ports for Export,* 225 I. C. C. 225, 229 (1937); *Ezee Flow Corp.* v. *Illinois Central R. Co.,* 287 I. C. C. 281, 284 (1952); 44 Stat. 1448, 49 U. S. C., Sec. 20(11).

However, there was no indication in the *Missouri Pacific-Rock Island* case that the carrier there opposing the new construction was undertaking to oust its grantor from an area bordering the grantor's right of way and which had been long served by the grantor through means other than direct track connection. That is what Southern is seeking to do here.

(D) FACTORS OTHER THAN APPELLANTS' ACTUAL SERVICE AT BOYCE REFUTE THE FINDINGS RELATING TO INVASION.

Other facts and circumstances, the significance of which was unmentioned by either the Commission or the district court, disprove the idea that the proposed construction would be an invasion.

The first railroad service at Boyce was established by appellants upon completion of the Western & Atlantic Railroad more than a century ago. Continuously since that time they have held themselves out to serve, and have served, Boyce and the surrounding area as the need for transportation has been made known to them. That service has been effected by the two means already discussed.

The appellants' proposal to provide direct service rather than service through the agency of Southern

resulted from requests by shippers who had only recently located at Boyce. Construction of appellants' track would be simply another phase of the fulfillment of their holding out to serve.

This distinction from the *Texas & Pacific* case has been noted by the courts as tending to disprove invasion. *Chicago, M. St. P. & P. R. Co.* v. *Chicago & E. I. R. Co.*, 198 F. 2d 8 (C. A. 7, 1952); *Pennsylvania Railroad Co.* v. *Reading Company*, 132 F. Supp. 616 (D. C., E. D. Pa., 1955), affirmed 226 F. 2d 958 (C. A. 3, 1955). It is likewise significant here.

2. The Re-establishment of Reciprocal Switching at Boyce Does Not Affect the Vitality of the Issues Presented.

By injecting the discussion of the case of *Cramet, Inc.* v. *Alabama Great Southern R. Co., et al.*, 298 I. C. C. 439, Southern (motion, p. 14) has confused the issue of public convenience and necessity, which is not before the Court on this appeal, with the issue of the Commission's jurisdiction; and in doing so it has inexplicably concluded that the unresolved jurisdictional question presented has become moot.

Appellants here assert a statutory right to construct the proposed trackage without Commission approval on the ground that the trackage falls within the provision of the statute—paragraph (22) of Section 1 of the Interstate Commerce Act—exempting it from Commission authority. They maintain that that right has been denied them as the result of misapplication of the statute and misapplication of a rule

of construction adopted by this Court, in the *Texas & Pacific* case, by which the jurisdiction of the Commission in such matters is determined in some cases. That right is not protected, or affected, by the Commission's action in the *Cramet* case.

That none of the issues has become moot should be obvious, for whether the Commission acted within its statutory authority in this case cannot be determined by what it did in a dissimilar and unrelated proceeding involving a determination of the lawfulness of Southern's action in suspending reciprocal switching at Boyce. And although all of the discussion on this subject, except as it tends to prove service by appellants at Boyce, has no bearing on the jurisdictional question, its relation to the instant case, if indeed there is any, must be clarified in view of Southern's representations concerning it.

Appellants did not seek "in two separate proceedings to secure *either* a new line of railroad into Boyce *or* reciprocal switching", as is asserted at page 15 of Southern's motion. They were the moving parties only in the application proceeding here considered. This proceeding was commenced at the request of the new industries at Boyce and had as its purpose, not to secure "a new line of railroad into Boyce," but rather, as is apparent from this appeal, a clarification of appellants' right to construct an industrial lead from their main line which already runs into and passes through Boyce.

The other of the "two separate proceedings" was a complaint instituted by Cramet, Inc., in the case re-

ferred to above which arose from Southern's action in removing that shipper from the Chattanooga switching district, thus depriving it of reciprocal switching. Appellants were joined with Southern as *defendants* in that complaint, but, under the circumstances presented, they did not defend Southern's action. Furthermore, the object of the complaint was not to "secure" reciprocal switching; the shipper had already had that service when it located at Boyce. It was seeking merely to regain what Southern had unlawfully taken away.

The foregoing makes it clear that there is no substance to Southern's claim that re-establishment of reciprocal switching at Boyce "makes the appeal in this proceeding moot." The re-establishment of reciprocal switching leaves unanswered the jurisdictional question upon which an important right of appellants depends. In seeking a determination of that question, appellants neither seek nor require this Court's approval of the proposed construction, as Southern argues (motion, p. 15).

Southern urges (motion, pp. 17-18) that continued assertion by appellants of the right to serve with their own facilities industries they already serve by other means is "self defeating." But Southern overlooks the fact that such prior service is the prime factor which removes this case from the scope of the *Texas & Pacific* rule. It also overlooks the fact that the effort on the part of a rail carrier to *improve* its service to a shipper does not prove a lack of service theretofore but the existence of such prior service.

3. Sustaining Appellants' Position in This Case Would in No Way Diminish the Commission's Authority, Nor Would It Enable Carriers to Avoid the Certificate Requirements of the Act Merely by Showing Service by Reciprocal Switching.

The contention of Southern that to uphold appellants' position that service through reciprocal switching under the circumstances here presented renders the *Texas & Pacific* case inapplicable "would severely limit the jurisdiction of the Interstate Commerce Commission" and "would emasculate the powers of the Commission" (Southern's motion, pp. 4, 17), is the direct outgrowth of the scope attributed by both Southern and the Government to that case. They view it, not as providing a simple rule of construction to meet a well-defined situation, but rather as constituting an all-inclusive set of "principles" to be followed in the determination of Commission authority. Such an interpretation would effectually repeal the exemption provisions of the statute, irrespective of other considerations, in all cases where carriers undertake to provide their own facilities in the performance of competitive service already rendered through other means.

Corollary to Southern's contention that the Commission's authority would be destroyed if the *Texas & Pacific* rule were held inapplicable here, is its suggestion that "If appellants' argument is accepted, then it would be possible for any rail carrier, where there was reciprocal switching, to build an extension of railroad to any plant which had reciprocal switching"

(Southern's motion, p. 16). The answer to both arguments is that a holding of inapplicability of the rule of the *Texas & Pacific* case could not in itself relieve a carrier from the certificate requirements of Paragraph 1(18), for any proposed new trackage would still be subject to classification as an extension of line under that section or a spur or industrial lead under paragraph 1(22) in accordance with the cases reviewed in the Jurisdictional Statement at pages 22-25.

A correct statement of appellants' objective in this litigation, contrary to Southern's conception given at page 4 of its motion, is that they seek simply to exercise a right provided by statute. That right should not be denied or impaired merely because its exercise would result in confining the Commission to the authority expressly conferred by that statute.

4. Determination of Commission Jurisdiction Is a Judicial Function; Therefore, the Court's Power to Review Commission Action on That Issue Is Plenary.

Appellants have been denied one of the most important rights possessed by railroads, that is, the right to build trackage to serve their customers. The denial has resulted from erroneous administrative action and inadequate judicial review of that action. This is a case, therefore, coming squarely within the reasoning and decision in *Crowell* v. *Benson*, 285 U. S. 22 (1932), wherein "the difference in security of judicial over administrative action" when fundamental rights are in question was emphasized (285 U. S., at page 61).

The *Crowell* case involved a dispute as to the propriety of the extent to which a district court had gone in determining lack of jurisdiction and consequent unlawfulness of administrative action under the Longshoremen's and Harbor Workers' Compensation Act. The action of the district court in hearing the matter *de novo* was upheld because the necessary determinations of fact were held to be "fundamental or 'jurisdictional', in the sense that their existence is a condition precedent to the operation of the statutory scheme" (285 U. S., at page 54). That is exactly the type of determination involved in this case.

The decision in *United States* v. *Idaho*, 298 U. S. 105 (1936), is in harmony with the *Crowell* case. There the district court heard new evidence in addition to that contained in the record made before the Commission on the very question presented here. The court's action in this respect was upheld as being not improper.

Appellants did not seek a trial *de novo*, nor do they now contend that such a course should have been pursued by the trial court, as Southern states (motion, p. 22). They do insist, however, that a proper determination by the district court of the Commission's jurisdiction could be made only by an examination of the record as well as the Commission's findings in order to ascertain whether the latter are supported by substantial evidence or whether, because of conflicts in or absence of facts, they should be revised or set aside. The opinion of the District Court indicates that this was not done. Not only did the court say that the facts were "not subject to review by this Court" (Jur. St.,

App. A-3), but it is apparent that it took its statement of facts from the Commission's report (Jur. St., App. A-3). Further, the court said: "Although *these findings were made by the Commission* in connection with the merits of the application . . . . they stand in the record for whatever purpose they may serve on the jurisdictional question as well" (Jur. St., App. A-11). And in rejecting the authorities cited by appellants in support of their position, the court said: "*In light of the finding of the Commission of the basic facts* set out above we do not believe that this case is controlled by any of them" (Jur. St., App. A-13).

From the foregoing it is clear that it is not appellants' position, as charged, that the Commission's jurisdictional findings "have no significance" (Southern's motion, p. 23) and, further, that Southern's characterization of such findings as "undisputed" (motion, p. 23) is wrong.

The case of *Gray* v. *Powell,* 314 U. S. 402 (1941), is represented by Southern as having commenced "a line of decisions" narrowly restricting court review of administrative action, "even with respect to questions that would appear to be more legal than factual" (motion, p. 22). But there was no jurisdictional issue presented in that case. It involved reviewability of an administrative determination made pursuant to a statute which expressly provided that the agency's findings of fact were to be conclusive. The only case in which this Court has cited *Gray* v. *Powell* was decided fourteen years later, being *Mitchell* v. *Budd,* 350 U. S. 473 (1955). As in the *Gray* case, no question

of jurisdiction was in issue. The controversy arose from an administrative officer's interpretation of regulations he himself had promulgated pursuant to unquestioned statutory authority. Neither of these decisions is authority for the district court's declining to review the record in this case.

CONCLUSION.

The arguments advanced by appellees fail to show a lack of substantiality of the questions presented by this appeal and the motions to affirm the lower court's judgment should accordingly be denied.

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